

FILED

AUG 31 2022

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

V.

ROLAND HILL,

Defendant.

No. **4:22-cr-00481-RWS/SPM**

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Nino Przulj, Special Assistant United States Attorney for said District, and moves this Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, § 3141, et seq.

In further support, the United States of America states:

1. Defendant Roland Hill is charged with: (a) one count of Felon in Possession of a Firearm, in violation of 18 U.S.C. § 922(g)(1), an offense carrying a ten-year maximum term of imprisonment; (b) Intent to Distribute a Mixture or Substance Containing a Detectable Amount of Methamphetamine in violation of 21 U.S.C. § 841(a), an offense carrying a penalty of no more than twenty years' imprisonment; (c) Intent to Distribute a Mixture or Substance Containing a Detectable Amount of Cocaine Base in violation of 21 U.S.C. § 841(a), an offense carrying a penalty of no more than twenty years' imprisonment; and, (d) Possession of a Firearm in Furtherance of Drug Trafficking in violation of 18 U.S.C. § 924(c), an offense carrying a minimum of five years' imprisonment.

2. According to the St. Louis County Anti-Gang Unit (“AGU”), on March 16, 2022, AGU detectives and officers with the Tactical Operations and Canine Units were conducting surveillance in the First Precinct due to reports of violent crime, open-air narcotics sales, carjackings, robberies, and speeding cars.

3. Officers observed a silver Infiniti Q50 with no front license plate and dark tinted windows idling in front of a laundry mat. The car matched the description of a recently stolen car. Officers would later determine that Defendant Edward Trotter was in the driver’s seat and Roland Hill was in the backseat. A woman was also in the front passenger’s seat.

4. Believing the car to have backed into a parking spot in front of the laundry mat to sell drugs, police officers approached the driver’s side of the car to initiate an investigative stop. When police announced their presence, Defendant Trotter refused to roll down the window further than a couple inches. The initiating officer noticed that Defendant Trotter had a black purse across his chest with the top zipper unzipped. He also saw the occupants smoking and smelled a strong odor of marijuana.

5. When asked why there were no plates on the car, the passenger stated that she had recently bought the car. The initiating officer tried to verify the VIN number typically visible under the windshield on the driver’s side, but the VIN number was covered up by a piece of paper, preventing officers from determining if the car were stolen.

6. When officers asked Defendant Trotter to open the door to check the VIN sticker, Defendant Trotter refused. During the encounter, Defendant Trotter placed his right hand on the gear shift as if he were going to flee.

7. Officers then noticed Defendant Hill reaching around his feet in the back of the car and, almost simultaneously, Defendant Trotter began rolling up the window while reaching into the purse slung across his chest. Police drew their weapons and, after several commands,

Defendant Trotter complied.

8. Meanwhile, Defendant Hill fled the car on foot. After a chase across oncoming traffic and continued resistance, officers caught Defendant Hill across the street from the laundry mat. Following a search incident to arrest, officers found \$3,307 in Defendant Hill's pants pocket.

9. Inside Defendant Trotter's purse, officers found:

- a. a black Glock 27, .40 caliber semi-automatic pistol (s/n SCE659), with one round in the chamber and eighteen rounds in the extended magazine;
- b. a second extended magazine with twenty-nine rounds;
- c. two clear bags of a white rock-like substance;
- d. clear bag containing multiple green/white capsules of white powder; and,
- e. a black digital scale

10. Inside of the back of the car, officers found:

- a. black semi-automatic Anderson Manufacturing AM-15, .223/5.56 caliber AR pistol (s/n 19284816) with one round in the chamber and nineteen rounds in the magazine in plain view on the backseat;
- b. one clear bag of a white rock-like substance, one clear bag of a blue powder, and a clear bag with three white tablets inside of a black purse on the rear passenger floorboard;
- c. a bookbag on the backseat containing: (a) seven clear bags of vegetation; (b) a clear bag containing multiple multi-colored tablets; (c) a clear bag of white powder; (d) two black digital scales; and (e) a box of clear plastic bags; and,
- d. four cell phones in the backseat and \$200 in a separate black purse on the floor behind the passenger's seat.

11. The St. Louis County Crime Laboratory determined that Defendant Trotter had nine

capsules of fentanyl and nine clear plastic bags of cocaine base in his purse.

12. The St. Louis County Crime Laboratory also determined that the backpack found next to Defendant Hill in the backseat contained: (a) 223 tablets of methamphetamine (not including partial tablets, fragments, and powder); (b) two bags of cocaine base; (c) three hydrocodone pills; (d) alprazolam (a schedule IV narcotic); (e) 463.9 grams of marijuana and a small amount of THC; and (f) two tablets of fentanyl.

13. Defendant's criminal history reflects the following notable convictions:

- 20SL-CR00826-01, St. Louis County, *State of Missouri v. Roland C. Hill*
 - Guilty Plea/Sentence Date: July 22, 2021
 - Count One: Possession of a Controlled Substance (F)
 - Count Two: Resisting Arrest (M)
 - Sentence: One year Missouri Department of Corrections on both counts, concurrent with federal case.
- 4:19-CR-00213-AGF, Eastern District of Missouri, *U.S. v. Roland Hill*
 - Guilty Plea/Sentence Date: August 19, 2005
 - Count One: Possession with intent to distribute heroin and fentanyl (F)
 - Sentence: Thirty months in the Bureau of Prisons, followed by thirty-six months of supervised release. A petition for revocation has been filed and remains pending.

14. Following his conviction for possession with intent to distribute heroin and fentanyl, Defendant Hill had been released on supervision on July 7, 2021. After being mirandized, Hill admitted that he ran because he was on federal supervision and because of the guns and drugs in the backseat.

15. Defendant Hill's criminal history, the weight of the evidence against him, and the nature and circumstances of the offense charged reflect that there is a serious danger to the community that would be posed by Defendant's release. Further, there are no conditions or combination of conditions pursuant to 18 U.S.C. §3142(c)(1)(B) that will reasonably assure Defendant's appearance as required.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Nino Przulj
NINO PRZULJ #68334MO
Special Assistant United States Attorney
Thomas F. Eagleton Courthouse
111 South Tenth Street, 20th Floor
St. Louis, Missouri 63102
(314) 539-2200